FS-1 DWMU Closure Plan

Presentation to Ecology 8/13/13



FS-1 is a gravel unit sitting next to Trench 34



LLBG FS-1 DWMU Current Status & Background Information

History of Waste in Unit:

- Maximum inventory of waste included 4 MLLW and 7 TSCA LLW containers.
- MLLW and TSCA waste storage occurred from November 2007 through January 2008.
- MLLW was either treated prior to storage to meet LDR limits or was LDR compliant at the time of generation.

Current Status of DWMU & Clean Closure supporting information:

- All dangerous, mixed and TSCA waste has been removed, no additional dangerous or mixed waste will be added.
- Visual/Physical inspection has been completed. No signs of waste related staining present.
- A facility operating records review has been completed. No records of applicable spills/leaks/potential contamination.



OVERALL FS-1 CLOSURE STRATEGY

FS-1 DWMU is proposed to be clean closed based on the following:

- DWMU is empty
- Records indicate NO spills/leaks
- Visual walk downs indicate no staining
- Sampling to confirm Clean Closure is proposed (based on Visual Sampling Plan) – see next slide for SAP approach
- Following clean closure confirmation, DWMU signs will be removed, gravel will remain in place to support ongoing Trench 34 operations.



SAP APPROACH FOR FS-1 DWMU

- No focused sampling proposed based on the following background of unit: No recorded spills & no stains observed on visual examination
- Confirmation sampling is proposed to confirm clean closure levels have been met:
 - Perform grid sampling using procedures in accordance with SW-846, ASTM Standards, and other EPA-approved methods.
 - Number of samples calculated using Visual Sample Plan Software
 - Clean closure levels calculated using MTCA Method B.

